

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

FRED WATSON,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-2187 JCH
	)	
v.	)	
	)	JURY TRIAL DEMANDED
CITY OF FERGUSON, MISSOURI, et al.	)	
	)	
Defendants.	)	

**DEFENDANTS' CONSENT MOTION TO FILE CERTAIN DOCUMENTS**  
**UNDER SEAL**

COME NOW Defendants City of Ferguson and Eddie Boyd, III (collectively, "Defendants"), by and through their undersigned counsel, and pursuant to Local Rule of the United States District Court for the Eastern District of Missouri 13.05(A), Federal Rule of Civil Procedure 26(c), and the operative protective order in this case (ECF No. 47), respectfully request leave of Court to file under seal Defendants' Responses to Plaintiff's Statement of Additional Material Facts in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment and attached, unredacted Exhibit Nos. 6 – 23 until ninety (90) days after final disposition of the case. In support of this Consent Motion, Defendants state as follows:

1. On October 18, 2018, this Court entered an Amended Protective Order (ECF No. 47). *See Exhibit A*, attached hereto.
2. On January 21, 2022, Plaintiff Fred Watson ("Plaintiff") filed his Motion to Seal Documents Filed in Opposition to Defendants' Motion for Summary Judgment (ECF No. 195), which was granted by this Court on February 15, 2022.
3. Pursuant to the Amended Protective Order in this case, and also discussed in Plaintiff's Motion to Seal, many of the documents include internal investigatory and personnel

records documents arising from Plaintiff's employment with the City of Ferguson, the City of St. Ann and St. Louis Metropolitan Police Departments, which have been designated as "CONFIDENTIAL" by the Parties, as well as testimony relating to these documents that have also been designated as "CONFIDENTIAL".

4. Accordingly, due to the confidential and privileged information therein and the potential harm that could result from the public disclosure thereof, good cause exists to file Defendants' Responses to Plaintiff's Statement of Additional Material Facts in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment and attached exhibits under seal. *See* E.D.Mo. L.R. 13.05(A)(1) ("Upon a showing of good cause the Court may order that documents filed in a civil case be received and maintained by the Clerk under seal.").

5. Counsel for Plaintiff has consented to filing these documents under seal.

6. Pursuant to Local Rule 13.05(A)(4)(c), within three (3) business days of today's filing, Defendants will file a redacted version of Defendants' Responses to Plaintiff's Statement of Additional Material Facts in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment and attached Exhibit Nos. 6 – 23.

WHEREFORE, Defendants respectfully request this Court grant Defendants' Motion to file under seal Defendants' Responses to Plaintiff's Statement of Additional Material Facts in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment and attached, unredacted Exhibit Nos. 6 – 23 until ninety (90) days after final disposition of the case, and for such other and further relief as the Court deems appropriate.

**LEWIS RICE LLC**

By: /s/ Ronald A. Norwood  
Ronald A. Norwood, #33841MO  
Aarnarian D. Carey, #58286MO  
Jacqueline K. Graves, #64875MO  
600 Washington Ave., Suite 2500  
St. Louis, Missouri 63101  
(314) 444-7759 (Telephone)  
(314) 612-7759 (Facsimile)  
rnorwood@lewisrice.com  
acarey@lewisrice.com  
jgraves@lewisrice.com

*Attorneys for Defendants City of Ferguson*

**REEVES LAW, LLC**

By: /s/ John M. Reeves  
John M. Reeves, #59634MO  
3703 Watson Road  
St. Louis, MO 63109  
(314) 775-6985 (Telephone)  
reeves@reeveslawstl.com

*Attorney for Defendant Eddie Boyd, III*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 16th day of February, 2022, a true copy hereof was electronically filed with the Clerk of the Court using the CM/ECF system, to be served by operation of the Court's electronic filing system on all counsel of record.

/s/ Ronald A. Norwood